

EXHIBIT A

P.C. (MWZM), with offices located in Dallas, Texas and Houston, Texas. I am in good standing with respect to the State Bar of Texas. A true and correct copy of my resume is attached hereto as Exhibit A-1.

5. MWZM was retained by Plaintiff to file this lawsuit to enforce Plaintiff's interest in certain real property as a result of a default of under the loan agreement. The legal professionals of MWZM with whom I worked in providing these services are at all relevant times attorneys licensed by the State of Texas, in good standing and experienced in the areas of business, real estate, and commercial litigation practice. Without waiving the attorney-client privilege, the subject matter of the counsel and representation provided to Plaintiff by MWZM legal professionals included, but was not limited to: review and analysis of the loan documents at issue; review and analysis of the history of this matter; preparation and filing of the original complaint; completing service; drafting a motion to appoint an attorney add litem; multiple conferences with the attorney ad litem; preparing for an attending a status conference with the Court; drafting a request for entry of default; drafting a motion for default judgment; conducting legal research; and multiple conferences with Plaintiff's mortgage servicer regarding all of these items and this matter generally. These activities are set forth in chronological order by name and date on the invoices included with the motion as Exhibit A-2. The hours set forth for each activity were actually expended on the topics stated.

6. The reasonable incurred attorneys' fees are \$5,329.50 in filing and prosecuting its Plaintiff's claims to enforce its interest in certain real property as a result of the default of under the loan agreement between the parties. The hourly rate charged is \$200.00 per hour for attorneys and \$95.00 per hour for paralegals and legal assistants.

7. I have become familiar with the legal services necessary to handle claims based on and the reasonable charges for such legal services in the United States District Court for the Western District of Texas and within the State of Texas.

8 In considering reasonable attorneys' fees in this case, I have considered the time and labor involved; the difficulty of the issues presented; the experience, reputation, and ability of the attorneys involved in pursuing the claims; the skills requisite to properly conduct the case; customary charges of the Bar and awards in similar cases; and the amount in controversy.

9. Based upon my knowledge and experience with similar litigation in the state and federal courts in Texas over the last thirteen years, and applying the facts and factors set out above, it is my opinion that the hourly rate of \$200.00 per hour for attorneys and \$95.00 per hour for paralegals and legal assistants are reasonable and customary, and the sum of \$5,329.50 is reasonable attorneys' fees for prosecuting Plaintiff's claims for the enforcement of its interest in certain real property as a result of a default of under the loan agreement.

9. If any party files post-judgment motion, a reasonable fee for Plaintiff would be \$2,500.00. If this case is appealed to the court of appeals, a reasonable fee for the Plaintiff would be an additional \$5,000.00. If this case is appealed to the United States Supreme Court, a reasonable fee for the Plaintiff would be an additional \$2,500.00.

FURTHER DECLARANT SAYETH NAUGHT."

Signed this 5th day of December, 2018.



MARK D. CRONENWETT

EXHIBIT A-1

MARK D. CRONENWETT

14160 N. Dallas Parkway, Suite 900 • Dallas, Texas 75254 • (214) 635-2650

PROFESSIONAL EXPERIENCE

Mackie Wolf Zientz & Mann, P.C., Dallas, Texas, 10/12-present

Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

Higier Allen & Lautin, P.C., Addison, Texas, 1/09-10/12

Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

Cowles & Thompson, P.C., Dallas, Texas, 9/99-1/09

I was an associate until I was made a Shareholder in December 2000. Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

Fanning, Harper & Martinson, P.C., Dallas, Texas 9/98-9/99

I was an associate in the firm's governmental defense section. Practice areas: defense of governmental entities in civil rights and employment cases. My duties included sitting second chair at trial; drafting and answering discovery; drafting and arguing all varieties of motions; drafting appellate briefs; and attending mediations.

Kuntz & Bonesio, L.L.P., Dallas, Texas 6/97-9/98

I was a litigation associate. Practice areas: commercial litigation, general insurance defense, employment law, and insurance subrogation. My duties included sitting second chair at trial; drafting and answering discovery; drafting and arguing all varieties of motions.

Texas Court of Appeals, Tenth District, Waco, Texas, 10/94-6/97

I was a briefing attorney for Judge Bob Cummings until July 1996 when I was hired as Judge Cummings' permanent staff attorney. I was the principal legal advisor to Judge Cummings; researched and drafted opinions in complex appeals; consulted with other judges on reconciling differences on the correct application of law; prepared drafts of opinions reconciling differences; led discussions of cases at court conferences; supervised interns and more junior legal staff; and handled the Court's motions docket.

Texas Employment Commission, Austin, Texas 1/94-10/94

I was a hearing officer, presiding over administrative hearings concerning unemployment compensation and issued written opinions.

EDUCATION

Juris Doctorate, 5/93

Catholic University of America, Washington D.C.

Associate Moot Court member, 1/91-5/93

Finalist, Dean's Cup Moot Court Competition, 3/91

President and Secretary of Guild of Catholic Lawyers, 5/91-5/93

B.A. in English Literature, concentrating in Politics, 5/90
University of Dallas, Irving, Texas

PROFESSIONAL
ASSOCIATIONS

Admitted to Texas State Bar, Fifth Circuit, and all Texas Federal District Courts;
Member of the Dallas Bar Association; Consumer Law and Civil Appellate Sections of
the Texas Bar; Federal Bar Association; Immediate Past President, St. Thomas More
Society; Pro Bono Counsel to White Rose Women's Center

EXHIBIT A-2

Invoice Date

12/05/2018

Invoice Number

DRAFT

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

Shellpoint Mortgage Servicing
 2020 S. Dairy Ashford #200
 Houston, TX 77077

Loan No. [REDACTED]
 Reference:
 Property Addr: 117 CLEVELAND
 MCGREGOR, TX 76657
 Our File: 17-000153-316-2

Loan Type: HEL; Case Type: Litigation

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
11/05/2018	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$200.00	0.30	\$60.00
Review new matter					
11/16/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	1.40	\$280.00
Completed drafting Motion for Default Judgment and Request for Clerk's Entry of Default.					
11/16/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Gather and prepare exhibits for Motion for Default Judgment					
11/16/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Finalize Servicemember's Affidavit for filing with Motion for Default Judgment					
11/16/2018	Paralegal Fee-Hourly-Recoverable Taplin, Susan	Yes	\$95.00	0.30	\$28.50
Telephone conference with court clerk regarding requested correction to the clerk's entry of default; prepare revisions and re-submit.					
11/16/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Research and obtain military status for Servicemember's Affidavit as exhibit to Motion for Default Judgment					
11/17/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Prepare correspondence to Defendant to include copies of Motion for Default Judgment					
11/28/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Prepare payoff request for Transfer Tax Lien(s)					
11/28/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Reviewed litigation files to assess status of foreclosure and default judgment.					

11/28/2018	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.30	\$28.50
Phone call and correspondence to Creel Law Group regarding transfer tax lien that is in default and referred to their firm for foreclosure.					
12/04/2018	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Call to Ovation Servicing to follow up on payoff statement for transfer tax lien					
12/05/2018	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Receive and review payoff statement from Transfer Tax Lienholder, Ovation Servicing					
12/05/2018	Associate Attorney Fee-Hourly- Recoverable Smith, Jonathan	Yes	\$200.00	0.80	\$160.00
Drafting Motion for Attorneys` Fees, its accompanying documents, and revising the Final Default Judgment to include granting of Attorneys` Fees as requested by court clerk.					
12/05/2018	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.40	\$38.00
Prepare exhibits for motion for attorney fees					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$768.00
Current Amount Due	\$768.00

TIMEKEEPER SUMMARY		
TIMEKEEPER	HOURS	AMOUNT
Cronenwett, Mark	0.30	\$60.00
Duncan-Abraham, Janie	2.10	\$199.50
Green, Gordon	1.60	\$320.00
Smith, Jonathan	0.80	\$160.00
Taplin, Susan	0.30	\$28.50

Invoice Date

04/18/2018

Invoice Number

226592

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
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 Fax: (214) 635-2686

INVOICE

RUSHMORE LOAN MANAGEMENT SERVICES, LLC
 15480 Laguna Cyn Road, Suite 100
 IRVINE, CA 92618

Loan No: [REDACTED]
 Reference:
 Property Addr: 117 CLEVELAND
 MCGREGOR, TX 76657
 Our File: 17-000153-316-2

Loan Type: HEL; Case Type: Litigation

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
09/21/2017	Associate Attorney Fee-Hourly Modric, Joseph	Yes	\$200.00	1.90	\$380.00
Initial review of judicial foreclosure matter with unobtainable assignment; Analysis of title report; Conduct search of McLennan County public records for additional documents in support of claim; Preparation of email to AVT Title seeking assistance in obtaining additional records that are not available online; Notes to file.					
11/02/2017	Associate Attorney Fee-Hourly Modric, Joseph	Yes	\$200.00	0.20	\$40.00
Review case file for status; Notes to file.					
11/08/2017	Paralegal Fee-Hourly Jackson, Erin	Yes	\$95.00	0.40	\$38.00
Followup correspondence sent regarding previous request for clear copy of Note and copies of Notice of Default (Breach/ demand Letter) dated after 8/5/2016. Additional followup regarding private lender tax liens.					
01/09/2018	Paralegal Fee-Hourly Jackson, Erin	Yes	\$95.00	0.20	\$19.00
Paralegal Fee-Hourly, Review court case status on docket for deadlines and upcoming hearings.					
01/16/2018	Associate Attorney Fee-Hourly Laurel, Melvin	Yes	\$200.00	0.10	\$20.00
Review file and status.					
01/26/2018	Associate Attorney Fee-Hourly Modric, Joseph	Yes	\$200.00	0.20	\$40.00
Review case file; Preparation of case summary in Caseaware.					
02/04/2018	Associate Attorney Fee-Hourly Green, Gordon	Yes	\$200.00	0.80	\$160.00
Reviewed file and pleadings in assignment of file to new attorney.					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$697.00
Current Amount Due	\$697.00

TIMEKEEPER SUMMARY

TIMEKEEPER	HOURS	AMOUNT
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Green, Gordon	0.80	\$160.00
Jackson, Erin	0.60	\$57.00
Laurel, Melvin	0.10	\$20.00
Modric, Joseph	2.30	\$460.00

Invoice Date

09/24/2018

Invoice Number

242033

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
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INVOICE

Shellpoint Mortgage Servicing
 2020 S. Dairy Ashford #200
 Houston, TX 77077

Loan No [REDACTED]
 Reference:
 Property Addr: 117 CLEVELAND
 MCGREGOR, TX 76657
 Our File: 17-000153-316-2

Loan Type: HEL; Case Type: Litigation

BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
08/16/2018	Filing Costs - Original Complaint- Recoverable	Yes	\$400.00
09/15/2018	Process Server Costs - Service On Janet Owens- Recoverable	Yes	\$158.50

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
04/16/2018	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$200.00	1.20	\$240.00
Review title issues.					
05/10/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Contacted insurance company re: title claim					
05/14/2018	Paralegal Fee-Hourly- Recoverable Mullins, Nancy	Yes	\$95.00	0.20	\$19.00
Review court case status on docket for deadlines and upcoming hearings.					
05/14/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Reviewed and analyzed file for update in status of litigation					
05/31/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.40	\$80.00
Reviewed documents provided by title company and discussed title issues					
06/18/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.30	\$60.00
Reviewed file for compliance with notice and status of litigation					
06/22/2018	Paralegal Fee-Hourly- Recoverable Mullins, Nancy	Yes	\$95.00	0.20	\$19.00
Review court case status on docket for deadlines and upcoming hearings.					
06/25/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Analyze title issues after discussion with claims counsel					
06/28/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.10	\$20.00
Provided update in status of communications with title counsel					

06/28/2018	Paralegal Fee-Hourly-Recoverable Mullins, Nancy	Yes	\$95.00	0.20	\$19.00
07/03/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.30	\$60.00
Reviewed claims letter from title company and determined next course of action					
07/13/2018	Paralegal Fee-Hourly-Recoverable Mullins, Nancy	Yes	\$95.00	0.20	\$19.00
07/16/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Reviewed and analyzed file in preparation for client call					
07/23/2018	Paralegal Fee-Hourly-Recoverable Mullins, Nancy	Yes	\$95.00	0.20	\$19.00
Review case status for litigation matter.					
07/26/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	3.00	\$600.00
Drafted Original Complaint for foreclosure and reformation of DOT					
07/27/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.60	\$120.00
Revised Original Complaint for judicial foreclosure and reformation					
07/31/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Conducted review of file for potential rescission of acceleration issues					
08/07/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Reviewed status of authorization to reform deed as part of litigation					
08/09/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.10	\$20.00
Reviewed client's communication and prepared for filing accordingly					
08/09/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.60	\$120.00
Revised and prepared Original Complaint for filing					
08/16/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Research and obtain SCRA results for each (2) defendants					
08/16/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Research and obtain PACER results for each (2) defendants					
08/16/2018	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$200.00	0.20	\$40.00
Review and revise complaint.					
08/21/2018	Paralegal Fee-Hourly-Recoverable Goad, Brandie	Yes	\$95.00	0.20	\$19.00
Prepared Summons Request on Tom and Janet Owens					
08/22/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Correspondence to process server to request personal service on defendants Janet Owens and Tom Owens.					
08/27/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00

Rec'd correspondence from process server advising Janet Owens does not live at property address (confirmed by Tom Owens)					
08/27/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Receive and review correspondence from process server confirming Tom Owens has been served on 8/24/28. Return of service is being filed w/the court.					
08/29/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Phone call from sister of Tom Owens, to discuss issues caused by legal description on our DOT.					
08/29/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Correspondence to process server to advise we are researching to find alternate address for Janet Owens.					
08/31/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.10	\$20.00
Contacted borrower to discuss lawsuit					
09/03/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.30	\$60.00
Researched public records to find address of service for Defendant Janet Owens.					
09/04/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Correspondence to process server to provide new address for Janet Owens					
09/06/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.30	\$28.50
Receive call from Janet Owens, named defendant to discuss citation and petition served on her.					
09/06/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Receive and review correspondence from process server confirming Janet Owens was served at alternate address					

TOTALS	
DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$558.50
Total Hourly Fees Since Last Billing	\$1,993.50
Current Amount Due	\$2552.00

TIMEKEEPER SUMMARY		
TIMEKEEPER	HOURS	AMOUNT
Cronenwett, Mark	1.40	\$280.00
Duncan-Abraham, Janie	2.10	\$199.50
Goad, Brandie	0.20	\$19.00
Green, Gordon	7.00	\$1,400.00
Mullins, Nancy	1.00	\$95.00

Invoice Date

05/09/2018

Invoice Number

228859

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

RUSHMORE LOAN MANAGEMENT SERVICES, LLC
 15480 Laguna Cyn Road, Suite 100
 IRVINE, CA 92618

Loan No: [REDACTED]

Reference:

Property Addr: 117 CLEVELAND

MCGREGOR, TX 76657

Our File: 17-000153-316-2

Loan Type: HEL; Case Type: Litigation

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
03/13/2018	Paralegal Fee-Hourly-Recoverable Mullins, Nancy	Yes	\$95.00	0.20	\$19.00
Sent Title Demand letter with exhibits via Certified Mail to First American Title Insurance. Company.					
03/21/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.10	\$20.00
Reviewed correspondence from insurance company re: title claim					
03/27/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.10	\$20.00
Reviewed letter from insurance company re: receipt of title claim					
04/03/2018	Hourly Attorney Fees Escobedo, Rosalie	N/A	\$95.00	0.20	\$19.00
Reviewed case status.					
04/12/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Reviewed file and pleadings for update in status of title demand.					
04/16/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Analyze title issues and communicate those issues to client.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$158.00
Current Amount Due	\$158.00

TIMEKEEPER SUMMARY

TIMEKEEPER	HOURS	AMOUNT
Escobedo, Rosalie	0.20	\$19.00
Green, Gordon	0.60	\$120.00
Mullins, Nancy	0.20	\$19.00

Invoice Date

11/13/2018

Invoice Number

246322

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

Shellpoint Mortgage Servicing
 2020 S. Dairy Ashford #200
 Houston, TX 77077

Loan No: [REDACTED]
 Reference:
 Property Addr: 117 CLEVELAND
 MCGREGOR, TX 76657
 Our File: 17-000153-316-2

Loan Type: HEL, Case Type: Litigation

BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
10/05/2018	Process Server Costs - Tom Owens served 8/24/18- Recoverable	Yes	\$158.50

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
09/06/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.30	\$60.00
Reviewed/analyzed title docs from Defendant					
09/06/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Assessed future action to be taken re: Defendant's divorce docs					
09/11/2018	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Receive and review Special Warranty Deed from Janet to Tom (per divorce)					
09/14/2018	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Receive call from Janet Shockley (Owens), advising she has filed the revised Quit Claim Deed, and has asked be non-suited from case.					
09/17/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.30	\$60.00
Reviewed quit-claim deed and assessed future action as to ex-wife					
09/20/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Communicated with counsel for Janet Owens re: agreed order					
09/20/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Drafted Rule 11 agreement and sent to opposing counsel					
09/24/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.80	\$160.00
Drafted Motion for Agreed Entry of Order					
10/02/2018	Associate Attorney Fee-Hourly- Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00

Communicated with opposing counsel re: motion for entry of agreed order					
10/12/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Responded to request for advisement re: suit to compel tax payoff					
10/16/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Reviewed signed Order provided by counsel for Janet Owens					
10/17/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Finalize Agreed Order as to Plaintiff and Defendant Janet Owens, and sent for filing.					
10/29/2018	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$200.00	0.20	\$40.00
Receipt and review court's signed agreed foreclosure order as to Janet Owens.					
11/01/2018	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Review file to determine status of case. , Review court case status on docket for deadlines and upcoming hearings.					
11/01/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	1.00	\$200.00
Began drafting Motion for Default Judgment against Defendant Tom Owens.					
11/01/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.40	\$80.00
Reviewed transfer tax file to assess future action and whether new litigation matter is warranted					
11/05/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Reviewed and analyzed file to provide case strategy to client.					
11/05/2018	Associate Attorney Fee-Hourly-Recoverable Green, Gordon	Yes	\$200.00	0.20	\$40.00
Communicated with opposing counsel regarding entry of the Agreed Order.					

TOTALS	
DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$158.50
Total Hourly Fees Since Last Billing	\$996.00
Current Amount Due	\$1154.50

TIMEKEEPER SUMMARY		
TIMEKEEPER	HOURS	AMOUNT
Cronenwett, Mark	0.20	\$40.00
Duncan-Abraham, Janie	0.80	\$76.00
Green, Gordon	4.40	\$880.00